

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

Timothy Jackson,

Plaintiff,

v.

Laura Wright, Milton B. Lee, Melisa Denis, Mary Denny, Daniel Feehan, A.K. Mago, Carlos Munguia, and G. Brint Ryan, each in their official capacities as members of the Board of Regents for the University of North Texas System; **Rachel Gain; Ellen Bakulina; Andrew Chung; Diego Cubero; Steven Friedson; Rebecca Dowd Geoffroy-Schwinden; Benjamin Graf; Frank Heidelberger; Bernardo Illari; Justin Lavacek; Peter Mondelli; Margaret Notley; April L. Prince; Cathy Ragland; Gillian Robertson; Hendrik Schulze; Vivek Virani; and Brian F. Wright,** Defendants.

Case No. 4:21-cv-00033-ALM

January 25, 2025.

MOTION FOR LEAVE TO FILE CONSOLIDATED OPPOSITION BRIEF

Plaintiff Timothy Jackson respectfully moves for leave to file a consolidated opposition brief of 60 pages to the two summary judgment briefs submitted by Defendants in the above-captioned case. ECF No. 83 and 84.

One of Defendants' summary judgment briefs addresses claims brought against individual defendants, captioned Defamation Defendants' Motion for Summary Judgment. ECF No. 83. The second addresses Plaintiff's First Amendment claim and is captioned The Board Defendants' Motion for Summary Judgment. ECF No. 84.

Plaintiff will file his oppositions to these motions by the Court-ordered deadline of January 17, 2025. ECF No. 86. The same nucleus of facts must be addressed in each of Plaintiff's

opposition briefs. In addition, because of the large number of individual defendants (18), the factual material is extensive and complex.

According to the local rules of this Court, Plaintiff may file a 30-page response to each of Defendants' motions for summary judgment, which would mean to, separate briefs, with overlapping facts, for a total of 60 pages. E.D.Tex. L.R. CV-7(1)(a).

To simplify the briefing, Plaintiff therefore respectfully requests leave to file a consolidated opposition brief of 60 pages, not inclusive of accompanying evidence and exhibits. Plaintiff submits that this will conserve the resources of the Court and the parties in addressing one filing rather than multiple.

DATE: January 10, 2025

Respectfully submitted,

/s/Michael Thad Allen

Michael Thad Allen, Esq.
D. Conn. Bar No. CT29813
admitted *pro hac vice*
Lead Attorney
ALLEN LAW, LLC
PO Box 404
Quaker Hill, CT 06375
(860) 772-4738 (phone)
(860) 469-2783 (fax)
mallen@allenharrislaw.com

Jonathan Mitchell
Texas Bar No. 24075463
MITCHELL LAW PLLC
111 Congress Avenue, Suite 400
Austin, Texas 78701
(512) 686-3940 (phone)
(512) 686-3941 (fax)
jonathan@mitchell.law

for PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that on the date specified in the caption of this document, I electronically filed the foregoing with the Clerk of Court, to be served on all parties of record via the CM/ECF system.

/s/Michael Thad Allen

Michael Thad Allen

CERTIFICATE OF CONFERENCE

I hereby certify that counsel has complied with the meet and confer requirement in Eastern District of Texas Local Rule CV-7(h). The instant motion is unopposed.

/s/Michael Thad Allen

Michael Thad Allen